

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF GEORGIA

IN RE:

DALE S. DAVIDSON, : CASE NO.: 13-70713  
: :  
DEBTOR. : CHAPTER 7

**OBJECTION TO PROOF OF CLAIM**

Debtor, DALE S. DAVIDSON, objects to Proof of Claim Number Two, filed by Dana Ford in the amount of \$2,300,000.00 and assigns the following reasons:

1. The claim is unliquidated.
2. The claim is speculative in that it is a pending lawsuit in Walton County, Florida and a Judgment has not been entered in the case.

WHEREFORE, Debtor, DALE S. DAVIDSON, respectfully requests that this Honorable Court disallow the proof of claim filed by Dana Ford and order such other and further relief as is just and proper.

This 23<sup>rd</sup> day of January, 2015.

/s/ R. Bruce Warren  
R. Bruce Warren/ GA Bar No.: 738475  
Whitehurst, Blackburn & Warren  
809 S. Broad Street  
Thomasville, GA 31792  
229-226-2161

**CERTIFICATE OF SERVICE**

This is to certify that I have this day served a copy of the Objection to Proof of Claim Number Six, upon the following:

Kristin Hurst  
Chapter 13 Trustee  
ecf@ch13trustee.com

via email and those listed on the creditor matrix attached hereto by depositing a copy of the same in the United States mail, first class, in a properly addressed envelope with sufficient postage affixed thereto.

This 23rd day of January, 2015.

/s/ R. Bruce Warren

R. Bruce Warren/ GA Bar No.: 738475  
Whitehurst, Blackburn & Warren  
809 S. Broad Street  
Thomasville, GA 31792  
229-226-2161

**UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF GEORGIA**

**IN RE:**

	:	<b>CASE NO.: 13-70713</b>
<b>DALE S. DAVIDSON,</b>	:	
	:	
<b>DEBTOR.</b>	:	<b>CHAPTER 7</b>

**NOTICE**

COMES NOW, the Debtor, and having filed an Objection to Proof of Claim in this bankruptcy case.

YOUR RIGHTS MAY BE AFFECTED. YOU SHOULD READ THESE PAPERS CAREFULLY AND DISCUSS THEM WITH YOUR ATTORNEY, IF YOU HAVE ONE IN THIS BANKRUPTCY CASE. (IF YOU DO NOT HAVE ANY ATTORNEY, YOU MAY WISH TO CONSULT ONE.)

IF YOU DO NOT WANT THE COURT TO GRANT THE OBJECTION TO THE PROOF OF CLAIM, OR IF YOU WANT THE COURT TO CONSIDER YOUR VIEWS ON THE OBJECTION TO PROOF OF CLAIM, THEN YOU OR YOUR ATTORNEY MUST FILE WITH THE COURT A WRITTEN REQUEST TO THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF GEORGIA, POST OFFICE BOX 2147, COLUMBUS, GA 31902-2147 FOR HEARING ON OR BEFORE **FEBRUARY 26, 2015** AND MUST SERVE A COPY OF SAID OBJECTION UPON THE ATTORNEY FOR THE DEBTOR AND A COPY UPON THE TRUSTEE.

IF YOU MAIL YOUR REQUEST TO THE COURT FOR FILING, YOU MUST MAIL IT EARLY ENOUGH SO THE COURT WILL RECEIVE IT ON OR BEFORE THE DATE STATED ABOVE.

ANY REQUEST FOR A HEARING MUST ALSO BE MAILED TO THE MOVING PARTY AND UPON ALL OTHER PERSONS INDICATED ON THE CERTIFICATE OF SERVICE ATTACHED TO THIS PLEADING.

DECIDE THAT YOU DO NOT OPPOSE THE RELIEF SOUGHT IN THE REQUEST FOR DISMISSAL AND MAY ENTER AN ORDER GRANTING THAT RELIEF.

IF ANY OBJECTIONS ARE FILED, A HEARING WILL BE HELD ON **MARCH 18, 2015 AT 10:30 A.M. IN THE U.S. COURTHOUSE AND POST OFFICE, NORTH PATTERSON STREET, VALDOSTA, GA 31601.**

This the 23rd day of January, 2015.

/s/ R. Bruce Warren

R. Bruce Warren/ GA Bar No.: 738475  
Whitehurst, Blackburn & Warren  
809 S. Broad Street  
Thomasville, GA 31792  
229-226-2161

**CERTIFICATE OF SERVICE**

This is to certify that I have this day served a copy of the Objection to Proof of Claim Number Two, upon the following:

Kristin Hurst  
Chapter 13 Trustee  
ecf@ch13trustee.com

via email and those listed on the creditor matrix attached hereto by depositing a copy of the same in the United States mail, first class, in a properly addressed envelope with sufficient postage affixed thereto.

This 23rd day of January, 2015.

/s/ R. Bruce Warren

R. Bruce Warren/ GA Bar No.: 738475  
Whitehurst, Blackburn & Warren  
809 S. Broad Street  
Thomasville, GA 31792  
229-226-2161

Label Matrix for local noticing

113G-7

Case 13-70713

Middle District of Georgia

Valdosta

Fri Jan 23 09:51:32 EST 2015

Thomasville National Bank

Moore, Clarke, DuVall & Rodgers, P.C.

c/o Edgar W. Duskin, Jr.

PO Drawer 71727

Albany, GA 31708-1727

Alan B. Bookman, as Successor Personal Repre

Alan B. Bookman, Personal Representative

c/o Stephen G. Gunby

P.O. Box 1199

Columbus, GA 31902-1199

Kelley, Lovett & Blakey

Post Office Box 70879

Albany, GA 31708-0879

7

901 Front Avenue

P.O. Box 2147

Columbus, GA 31902-2147

Alan B. Bookman, as Personal Representative

1111 Bay Ave

Columbus GA 31901-5218

Chase

PO Box 15153

Wilmington DE 19850-5153

Chase Bank USA NA / Bank One

PO Box 15298

Wilmington, Delaware 19850-5298

Circuit Court Walton County

Walton County Clerks Office

PO Box 1260

DeFuniak Springs, FL 32435-1260

Commercial Bank

101 South Crawford Street

Thomasville, Georgia 31792-5502

Dana Ford

c/o Thompson, Crawford & Smiley

1330 Thomasville Rd.

Tallahassee, FL 32303-5608

Estate of Deborah E. Irby

c/o Stephen G. Gunby

Page Scranton Sprouse Tucker & Ford, PC

P.O. Box 1199

Columbus, GA 31902-1199

JPMorgan Chase Bank, National Association

c/o McCalla Raymer, LLC

Bankruptcy Department

1544 Old Alabama Road

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James Andrew Ball, IV

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Thomasville, GA 31792-7407

Michael F. Coppins

Monroe Adkins & Dincman PA

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P O Box 14447

Tallahassee, FL 32317-4447

Rhonda Davidson

109 Tuxedo Dr.

Thomasville, GA 31792-6760

State of Georgia

1800 Century Center Blvd., NE

Atlanta, GA 30345-3205

Thomasville National Bank

301 N. Broad Street, P.O. Box 1999

Thomasville, Georgia 31799-1999

Thomasville National Bank

c/o Edgar W. Duskin, Jr.

Moore, Clarke, DuVall & Rodgers, P.C.

PO Drawer 71727

Albany, Georgia 31708-1727

U.S. Trustee - MAC

440 Martin Luther King Jr. Boulevard

Suite 302

Macon, GA 31201-7987

Dale S Davidson

109 Tuxedo Dr.

Thomasville, GA 31792-6760

Mark L. Manley

Rowell Auctions, Inc.

PO Box 3428

Moultrie, GA 31776-3428

Ronald B. Warren

Whitehurst, Blackburn, Warren and Kelley

809 South Broad Street

Thomasville, GA 31792-6112

Walter W Kelley

Chapter 7 Trustee

P.O. Box 70879

Albany, GA 31708-0879

(u)Gene L. Davidson Revocable Trust

(u)JPMorgan Chase Bank, National Association

(u)Riverview Farm of Havana, LLC

(u)The Davidson Family Limited Partnership

(u)Dana Ford

(u)Gene L. Davidson

End of Label Matrix

Mailable recipients	24
Bypassed recipients	6
Total	30